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10 JULIO NEVAREZ-ERUNEZ

11  
12 IN THE UNITED STATES DISTRICT COURT  
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14  
15 UNITED STATES OF AMERICA, ) Case No. 2:22-cr-210-DJC  
16 v. )  
17 JULIO NEVAREZ-ERUNEZ, ) STIPULATION AND ORDER TO  
18 Plaintiff, ) MODIFY CONDITIONS OF PRETRIAL  
19 ) RELEASE  
20 )  
21 )  
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Judge: Hon. Kendall J. Newman  
)

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel, Assistant United State Attorney Emily Sauvageau, counsel for the United States, and Assistant Federal Defender Meghan D. McLoughlin, counsel for Defendant Julio Nevarez-Erunez, that Special Conditions 12 and 13 be removed from Mr. Nevarez-Erunez's conditions of release.

Mr. Nevarez-Erunez was released from custody onto pretrial supervision on April 26, 2023. ECF No. 70. He is currently residing and working in Oregon. The conditions of his release require him to participate in location monitoring and abide by a daily curfew to his residence from 8:00 p.m. to 6:00 a.m. *See* ECF No 75 at ¶¶12, 13. Since his release, for over six months, Mr. Nevarez-Erunez has complied with all conditions, including his location monitoring and curfew, and is currently employed.

1           In addition, in late September, Mr. Nevarez-Erunez sought permission to temporarily  
2 suspend Special Conditions 12 and 13, related to his location monitoring and curfew, in order to  
3 travel out of district on a work project. *See* ECF No. 90. After completing the work project, he  
4 reported back to pretrial services with no issues.  
5

6           In light of this, the parties now request that Mr. Nevarez-Erunez's conditions of release  
7 be modified, and specifically that Conditions 12 and 13 be removed entirely. Pretrial Services  
8 has no objection to the modification. All other previously imposed terms and conditions will  
9 remain in full force and effect.  
10

11           Dated: November 1, 2023

12           Respectfully submitted,

13           HEATHER E. WILLIAMS  
14           Federal Public Defender

15           */s/ Meghan D. McLoughlin*  
16           MEGHAN D. McLOUGHLIN  
17           Assistant Federal Defender  
              Attorneys for Defendant  
              JULIO CESAR NEVAREZ-ERUNEZ

18           Dated: November 1, 2023

19           PHILLIP A. TALBERT  
20           UNITED STATES ATTORNEY

21           */s/ Emily G. Sauvageau*  
22           EMILY G. SAUVAGEAU  
23           Assistant United States Attorney

## **FINDINGS AND ORDER**

Pursuant to the parties' stipulation, and good cause appearing, the Court hereby modifies the Order Setting Special Conditions of Release, ECF No. 75, to remove Special Conditions 12 and 13. All other previously imposed terms and conditions will remain in full force and effect.

## **IT IS SO FOUND AND ORDERED.**

Dated: November 1, 2023

*Kendall J. Newman*  
KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE